

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Shenzhen CARKU Technology Co., Ltd.,

Plaintiff,

v.

Shenzhen Xinzexing E-commerce Co., Ltd.,

Defendant.

Case No. 1:22-cv-03403

Judge Steven C. Seeger

Jury Trial Demanded

**DEFENDANT’S NOTICE OF FILING OF PETITION
FOR *INTER PARTES* REVIEW (IPR) OF U.S. PATENT NO. 9,643,506**

Defendant Shenzhen Xinzexing E-commerce Co., Ltd. (“SXE”), through its undersigned counsel, hereby notifies the Court that SXE has filed a Petition for *Inter Partes* Review (“IPR”) in the U.S. Patent and Trademark Office (the “Patent Office”) directed to U.S. Patent No. 9,643,506 (“the ‘506 patent”), the patent at issue in this litigation.

The Petition for IPR is dated November 21, 2023, and requests a finding from the Patent Office that claims 1-3, 6-23, and 25-33 of the ‘506 patent are invalid in light of various prior art patents and other references. To the best of SXE’s knowledge, the Patent Office has not yet granted, denied, or otherwise acted with respect to the Petition.

Dated: November 29, 2023

Respectfully submitted,

By: /s/ Matthew G. McAndrews

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 29, 2023, the foregoing

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was filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to all counsel of record.

/s/ Matthew G. McAndrews

Attorney for Defendant,

NIRO McANDREWS, LLP